

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

OFFENSE CHARGED

See Attachment A

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY:

See Attachment A

PROCEEDING

Name of Complainant Agency, or Person (&Title, if any)
 Department of Homeland Security/Immigration Customs Enforcement

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a reprocution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

07-70629

Name and Office of Person Furnishing Information on THIS FORM

JOSEPH P. RUSSONIELLO

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

Tarek J. Helou

IS NOT IN CUSTODY

- 1) If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO Attala, S. Michael
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
CRO-698 MJC

UNITED STATES OF AMERICA,

v.

ALIREZA RAHMANI

DEFENDANT(S).

SUPERSEDING INDICTMENT

18 U.S.C. § 2251(c)(1) - Production Of Child
Pornography Outside the United States

18 U.S.C. § 2252(a)(1) - Transportation of Child
Pornography

18 U.S.C. § 2253(a)(1)-(3) - Sexual Exploitation of
Children; Criminal Forfeiture

JAD, c/f
A true bill.

James F. Alberardi
Foreman

Filed in open court this 17 day of

January 17, 2008.

Judith A. Faulk
Clerk

Bail, \$ no process

Sig. of D. C. Smith

ATTACHMENT A TO PENALTY SHEET

Superseding Indictment

United States v. Alireza Rahmani, Case No. CR-07-698-MMC

Offenses Charged:

18 U.S.C. § 2251(c)(1): Producing child pornography outside the U.S. (class B felony)

18 U.S.C. § 2252(a)(1): Transportation of child pornography (class C felony)

18 U.S.C. § 2253(a)(1)-(3): Sexual exploitation of a minor criminal forfeiture

Penalties:

18 U.S.C. § 2251(c)(1):

- Minimum Prison Term of 15 Years;
- Maximum Prison Term of 30 Years;
- Maximum Fine of \$250,000;
- Maximum Lifetime Term of Supervised Release; and
- Mandatory Special Assessment of \$100.

18 U.S.C. § 2252(a)(1):

- Minimum Prison Term of 5 Years;
- Maximum Prison Term of 20 Years;
- Maximum Fine of \$250,000;
- Maximum Lifetime Term of Supervised Release; and
- Mandatory Special Assessment of \$100.

18 U.S.C. § 2253(a)(1)-(3):

- Forfeiture of items identified in the indictment

1 JOSEPH P. RUSSONIELLO (CABN 44332)
2 United States Attorney
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FILED
JAN 17 PM 2:07
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11
12

12 UNITED STATES OF AMERICA,) No. CR-07-698-MMC
13 Plaintiff,)
14 v.)
15 ALIREZA RAHMANI,)
16 Defendant.)
17 _____)
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VIOLATIONS:
18 U.S.C. § 2251(c)(1) – Production Of
Child Pornography Outside the United
States
18 U.S.C. § 2252(a)(1) – Transportation
of Child Pornography
18 U.S.C. § 2253(a)(1)-(3) – Sexual
Exploitation of Children; Criminal
Forfeiture
SAN FRANCISCO VENUE

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE: 18 U.S.C. § 2251(c)(1) – Production Of Child Pornography Outside the
United States

On or about April 11, 2007, in Germany, the defendant,

ALIREZA RAHMANI,

knowingly employed, used, persuaded, induced, enticed, and coerced at least one minor to engage
in sexually explicit conduct for the purpose of producing a visual depiction of such conduct,

Case No. CR-07-698-MMC
SUPERSEDING INDICTMENT

1 namely, digital images of minors engaged in sexually explicit conduct, and on or about October
2 25, 2007, did knowingly transport such visual depictions to the United States from Germany,
3 namely, to San Mateo County, within the Northern District of California, in violation of Title 18,
4 United States Code, § 2251(c)(1).

5

6 COUNT TWO: 18 U.S.C. § 2252(a)(1) – Transportation of Child Pornography

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8 On or about October 25, 2007, in the Northern District of California, the defendant,

9 ALIREZA RAHMANI,

10 did knowingly transport and ship in foreign commerce a visual depiction, where the producing of
11 such visual depiction involved the use of a minor engaging in sexually explicit conduct, and
12 where such visual depiction was of such conduct, in violation of Title 18, United States Code, §
13 2252(a)(1).

14

15 FORFEITURE ALLEGATIONS: 18 U.S.C. §§ 2253(a)(1)-(3) – Sexual Exploitation of
16 Children; Criminal Forfeiture

17 Upon conviction of one or more of the offenses alleged in Counts One and Two, the
18 defendant,

19 ALIREZA RAHMANI,

20 shall forfeit to the United States, under Title 18, United States Code, § 2253(a)(1)-(3), all visual
21 depictions described in Title 18, United States Code Section 2252 and all property, real and
22 personal, used or intended to be used to commit or promote the commission of the offenses of
23 conviction, including but not limited to the following items that were seized from defendant on
24 October 25, 2007:

25 a. Western Digital, model number WD2000 Caviar SE, Serial ATA, serial number
26 WCAL81957593, 200 GB;
27 b. Western Digital, model number WD1200 Caviar Enhanced IDE, serial number
28 WMAES1796996, 120 GB;

- c. Western Digital, model number WD1600 WD Caviar Enhanced IDE, serial number WMAL72033292, 160 GB
- d. Samsung Mighty Drive USB Device, storage size 2 Gigabytes;
- e. 14 DVDs; and
- f. 5 CDs.

DATED:

1-17-09

A TRUE BILL.

A TRUE BILL.
James E. Van Cleave
FOREPERSON

JOSEPH P. RUSSONIELLO
United States Attorney

KYLE F. WALDINGER
Deputy Chief, Major Crimes Section

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(Approved as to form: Jacob J. Helou)
AUSA HELOU